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June 4, 2007

VIA FACSIMILE

Judge Naomi R. Buchwald
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2270
New York, New York 10007

Re: Philip Hopkins, et anno. v. Visual Treasures, LLC, et al.
Case No. 07-cv-03650 (NRB)

Dear Judge Buchwald:

This firm represents the Plaintiffs, Philip Hopkins and Ralph Stevens ("Plaintiffs"), in the above-referenced action, which was removed by Defendants from the Supreme Court of the State of New York, County of New York on May 8, 2007. Pursuant to Your Honor's Individual Practices, I respectfully submit this correspondence requesting a pre-motion conference with the Court. Plaintiffs intend to submit a motion to remand this action to the State Court because that is the exclusive forum of disputes agreed upon by Plaintiffs and Visual Treasures, LLC as set forth in the Consulting Agreements and Security Agreement sued upon herein.

I would also like to bring to the Court's attention that pursuant to 28 U.S.C. §1447(c), the last day that Plaintiffs can serve and file their motion to remand is June 7, 2007. Further, on June 13, 2007, the parties are currently scheduled to attend a private mediation to discuss a global settlement of this matter. Accordingly, it is respectfully requested that the Court extend

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Plaintiffs' time to file and serve their motion to remand this action through and including June 21, 2007, to allow for both the pre-motion conference and the mediation.

Thank you for your courtesies.

Respectfully submitted,



Douglas J. Bilotti

cc: Timothy Pierce Kebbe, Esq.
William A. Rome, Esq.